

291553

ACCEPTED FOR PROCESSING - 2020 April 23 9:32 AM - SCPSC - 2019-281-S - Page 1 of 4

STATE OF SOUTH CAROLINA)
)
(Caption of Case)
Application of Palmetto)
Utilities, inc. for an)
increase of rates and charges)
for the provision of sewer)
service and modifications to)
certain terms and conditions)
of the provision of sewer)
service)

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET 2019 281 S
NUMBER: - -

(Please type or print)
Submitted by: Lisa Levine
Address: 2 Runnymede Ct
Blythewood, SC 29016

SC Bar Number:
Telephone:
Fax:
Other:
Email: Lev99webb@icloud.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

- ☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously
☒ Other: Second set of interrogatories

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input checked="" type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2019-281-S

IN RE:)	
)	
APPLICATION OF PALMETTO UTILITIES)	LISA LEVINE, PRO SE
INC. FOR AN INCREASE OF RATES AND)	SECOND SET OF
CHARGES FOR THE PROVISION OF)	INTERROGATORIES TO
SEWER SERVICE AND MODIFICATIONS)	PALMETTO UTILITIES, INC.
OF CERTAIN TERMS AND CONDITIONS)	
RELATED TO THE PROVISION OF SEWER)	
SERVICE.)	
_____)	

Pursuant to S.C. Code Ann. Refs. 103-833(C), Ms. Lisa Levine ("Levine") pro se, hereby submits the First Set of Interrogatories to Palmetto Utilities, Inc. (the "Company"). Pursuant to South Carolina Rule of Civil Procedure 26(e), each interrogatory is continuing until the time of the hearing such that the Company must promptly transmit to Levine the requested information as it becomes available. Please forward to the undersigned, via email, your first iteration of responses to the following request on or before May 22, 2020:

- 2-1 Please provide Schedules 100, 130, 300 and 301 from the Wastewater Utility Annual Reports of Palmetto Utilities for the years ended 2016, 2017 and 2019.

- 2-2 Please explain the reason(s) for the increasing annual averages and peak flows (Mgal) in the table provided in attachment 1-12 in response to Interrogatory 1-12. Levine appreciates that the Company released the data given the objection to the Interrogatory. Levine reaffirms the relevance of interrogatory 1-12. The flow data directly impacts capital investment and operating costs which are significant

parameters in the rate base methodology that the Company requests the Commission use to obtain a reasonable rate of return on invested capital and recovery of reasonable operating expenses. Levine notes that should the trend and rate of increasing monthly flows and peak flows since 2017 to March 2020 continue on the calculated trajectory the Company's operating expenses will also increase significantly in the short term, reduce its operating margin and opportunity to earn a reasonable return on its plant expansion investment as well as possibly needing to expand the plant to its 18 mgd design limit or beyond resulting in frequent additional rate increases unfairly burdening customers. Levine also notes that the ERCs reported in Docket 2017-228 and the Company's Ex Parte Briefing to the Commission on September 20, 2019 have remained relatively unchanged, 33,141 and 33,900 respectively, raising the possibility that the increased flow rates are not due to customer discharges but other operational factors that would not be reasonable for the customer to pay.

- 2-3 Please provide the number of customers on an annual basis from 2016 to the present whose bills were in arrears for 3 months or more.

Lisa Levine, pro se

By: s/Lisa Levine
Lisa Levine
2 Runnymede Ct.
Blythewood, SC 29016

lev99webb@icloud.com

April 22, 2020

Blythewood, South Carolina

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2019-281-S

IN RE:)
)
APPLICATION OF PALMETTO) LISA LEVINE, PRO SE
UTILITIES INC. FOR AN INCREASE) CERTIFICATE OF SERVICE
OF RATES AND CHARGES FOR THE)
PROVISION OF SEWER SERVICE AND)
MODIFICATIONS TO CERTAIN TERMS)
AND CONDITIONS OF THE)
PROVISION OF SEWER SERVICE.)
_____)

This is to certify that I, Lisa Levine, have this day served one
(1) copy of the Lisa Levine pro se Intervenor's Second Set of
Interrogatories upon the following parties to this proceeding by
causing said copy to be electronically mailed, addressed as
shown below:

John M.S. Hoefer, Esquire
Email: jhoefer@willoughbyhoefer.com
Andrew R. Hand, Esquire Willoughby & Hoefer, P.A.
Email: ahand@willoughbyhoefer.com

Jeffrey M. Nelson, Esquire
Email: jnelson@ors.sc.gov
Christopher Huber, Esquire
Email: chuber@ors.sc.gov
Jenny R. Pittman, Esquire Office of Regulatory Staff Email:
jpittman@ors.sc.gov

s/Lisa Levine
April 22, 2020, Blythewood, SC